

June 10, 2019

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Exhibit 18

Water Policy Interim Committee
c/o Legislative Environmental Policy Office
State Capitol Building
1301 E. 6th Ave., Room 171
P.O. Box 201704
Helena MT 59620-1704

Re: Proliferation of exempt wells exacerbates existing groundwater availability and dependability issues. Pilot Project Proposal to improve groundwater data collection and resource management.

Dear Water Policy Interim Committee Members,

Today's letter follows a previous one in which my family requested WPIC's response and action to address groundwater depletion that we observe personally in our local area, and share the same concern with others in across Montana. Protecting our right to adequate, available and dependable groundwater, while experiencing proliferation of exempt wells depends greatly on reliable and comprehensive water monitoring.

Background

Where we have existing groundwater depletion and potential water quality problems, prevention of further environmental degradation is imperative. Over the past year we have made numerous efforts to address our local, yet representative concerns for sustainability of groundwater. Our own neighborhood is seeking remedies to inadequate well water supply and volume, slow and restricted groundwater recharge, declining static water levels, deep and dry well holes, and questionable water quality issues. Water toting, well deepening, cisterns... these are not reasonable solutions, nor inexpensive.

Problems with groundwater availability and dependability in our area have been recognized in several county and state agency studies over many years. Community planning, where these issues are discussed, remind us that such documents are limited to guidance only. All the while developers move as expeditiously as possible to divide land into the smallest possible parcel sizes, encouraged by the state-legislated statutory time limits for subdivision review and approval.

We residents observe a steady stream of minor subdivision approvals, some appear stacked as in a series that may unofficially equate to a major subdivision without the same review scrutiny. We've learned that an applicant might easily demonstrate available, adequate and dependable water supply, as required by minimal application compliance under Montana's Administrative Rules, when data from the Ground Water Information Center (GWIC) database can be strategically manipulated to skew pro-development decisions. GWIC is a terrific database, and not always best applied despite the published MBMG disclaimer describing its wide variability in data source quality and use limitations.

Proposal

Current field monitoring to manage the groundwater in our area has increased since last summer, yet appears insufficient to address the growing water well problems. The following is a proposal to increase the quantity and quality of data collected under a Pilot Groundwater Monitoring Network Project, to monitor real-time changes in groundwater availability and dependability.

Our family well has on it installed one of MBMG's WellIntel real-time data collection systems. This proposal seeks attention from WPIC to assist by policy and promotion in widening use of this state-of-the-art technology in Montana, already successfully deployed in more than thirty other states.

Components of this proposal:

- * Assistance and guidance for continuing and enhancing the careful oversight by MDEQ to protect our access to groundwater by installation and use of WellIntel-collected data.
- * Oversight and assistance to MBMG on improving groundwater monitoring using modern and proven WellIntel technology that fills in baseline data gaps with cost-efficient monitoring.
- * Recommend the policies and means by Montana to secure Community Ground Water Monitoring Networks that include cost-share opportunities and greater existing well user participation.

Summary

Digging wells deeper, unenforceable restrictions on water use under combined appropriations, nor assuming that citizens can practically resolve conflicts in Water Court... are feasible and sustainable means to respond to our increasing groundwater depletion and exempt well problems.

Thank you for this opportunity to seek your attention and response. Please take a look at the attached well log, hydrograph and well sight pictures. We again look forward to your reply.

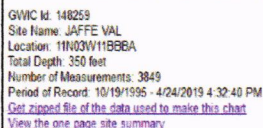
Sincerely,



Valerie Jaffe
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Attachments: Hydrographs, WellIntel,

The following chart represents the current hydrograph for this well. Data reported are static water levels in feet below ground surface. A filter has been applied to the data to remove all dry and/or non-static measurements.



Disclaimer

The preceding materials represent the contents of the GWIC databases at the Montana Bureau of Mines and Geology at the time and date [6/10/2019 12:36:45 PM] of the retrieval. The information is considered unpublished and is subject to correction and review on a daily basis. The Bureau warrants the accurate transmission of the data to the original user at the time and date of the retrieval. Retransmission of the data to other users is discouraged and the Bureau claims no responsibility if the material is retransmitted. There may be wells in the request area that are not recorded at the Information Center. Water level data downloaded from GWIC are not filtered and will contain all measurements.

MONTANA WELL LOG REPORT

This well log reports the activities of a licensed Montana well driller, serves as the official record of work done within the borehole and casing, and describes the amount of water encountered. This report is compiled electronically from the contents of the Ground Water Information Center (GWIC) database for this site. Acquiring water rights is the well owner's responsibility and is NOT accomplished by the filing of this report.

Other Options

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Site Name: JAFFE VAL
GWIC Id: 148259
DNRC Water Right: C092792-00

Section 1: Well Owner(s)

1) JAFFE, VAL (MAIL)
2623 TEA RD
HELENA MT 59601 [06/17/1993]

Section 2: Location

Township	Range	Section	Quarter Sections	
11N	03W	11	NE1/4 NW1/4 NW1/4 NW1/4	
County		Geocode		
LEWIS AND CLARK		Longitude	05195511101320000	
Latitude		-111.9554411		Datum
46.7329651		SUR-GPS		WGS84
Ground Surface Altitude		Ground Surface Method		Date
3904.14		SUR-GPS		NAV/D88 4/18/2011
Measuring Point Altitude		MP Method		Date Applied
3904.6		SUR-GPS NAV/D88		11/4/2004 12:13:00 PM

VALLEY VIEW HEIGHTS

Section 3: Proposed Use of Water
DOMESTIC (1)

Section 4: Type of Work

Drilling Method: ROTARY
Status: NEW WELL

Section 5: Well Completion Date

Date well completed: Thursday, June 17, 1993

Section 6: Well Construction Details

Borehole dimensions

From	To	Diameter
0	350	6

Casing

From	To	Diameter	Wall Thickness	Pressure Rating	Joint	Type
-1.5	179	6	0.25		WELDED	STEEL
10	350	4		220.00		PVC

Completion (Perf/Screen)

From	To	Diameter	# of Openings	Size of Openings	Description
300	350	4		4X 025	FACTORY SLOTTED

Annular Space (Seal/Grout/Packer)

From	To	Description	Fed?
0	173	BENTONITE	

Section 7: Well Test Data

Total Depth: 350
Static Water Level: 182
Water Temperature:

Air Test

12. gpm with drill stem set at feet for 1 hours.
Time of recovery 0.35 hours.
Recovery water level 162 feet.
Pumping water level 335 feet.

* During the well test the discharge rate shall be as uniform as possible. This rate may or may not be the sustainable yield of the well. Sustainable yield does not include the reservoir of the well casing.

Section 8: Remarks

Section 9: Well Log

Geologic Source
120SDMS - SEDIMENTS (TERTIARY)

[illegible]

Driller Certification

All work performed and reported in this well log is in compliance with the Montana well construction standards. This report is true to the best of my knowledge.

Name: _____

Company: H & L DRILLING INC.

License No: WWC-447

Date Completed: 6/17/1993



WellIntel data collection system
GWIC 148259
Owner: MBMG
East North Helena Valley
Summer 2018, Winter 2018-2019

